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Attorneys for Defendants  
**SAMSUNG ELECTRONICS CO., LTD. and**  
**SAMSUNG ELECTRONICS AMERICA, INC.**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

## IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION

No. 07-5944-SC  
MDL No. 1917

Judge: Hon. Samuel Conti  
Special Master: Hon. Charles A. Legge (Ret.)

**DECLARATION OF IAN SIMMONS IN  
SUPPORT OF DEFENDANTS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASE SHOULD  
BE RELATED PURSUANT TO CIV. L. R.  
3-12**

1 I, Ian Simmons, hereby declare as follows:

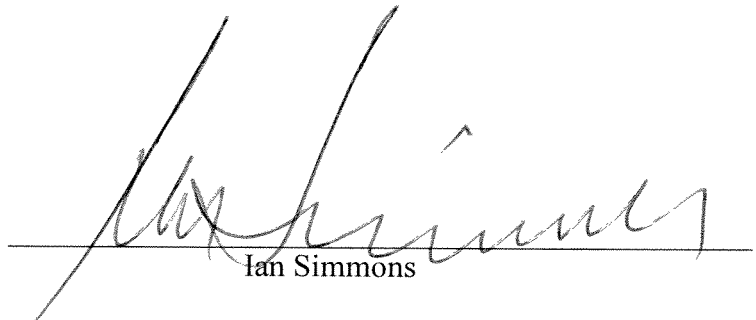
2 1. I am an attorney admitted to practice before this Court. I am a partner at  
3 O'Melveny & Myers LLP, counsel of record for defendants Samsung Electronics Co., Ltd. and  
4 Samsung Electronics America, Inc. I am making this declaration in support of Defendants'  
5 Administrative Motion To Consider Whether Case Should Be Related. I have personal knowledge  
6 of the facts herein and, if called as a witness, could and would testify competently hereto.

7 2. Attached hereto as Exhibit A is a copy of the Complaint filed in Target Corp. et al.  
8 v. Chungwa Picture Tubes, Ltd. et al. (the "Target Action"), assigned case number 3:11-cv-05514-  
9 EDL.

10 3. No defendants have yet appeared in the Target Action. Civil Local Rule 3-12  
11 requires parties to "promptly file" any motions to relate cases. Accordingly, defendants were  
12 unable to obtain a stipulation to relate these cases.

13 I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing is true and correct and that this Declaration was executed on January 20, 2012, in  
15 Washington, D.C.

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Ian Simmons